

REMARKS

Claims 1-14 and 28-30 are currently pending. Claims 1-14 and 28-30 were rejected.

Claim Rejections -35 USC § 103

Claims 1-3, 5-14, and 28-30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent 5,920,322 issued to Ulichney (hereinafter Ulichney) in view of U.S. patent application publication no. 2003/0007686 by Roever (hereinafter Roever). Claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Ulichney in view of Roever and US Patent Publication 2003/0132906 by Tanaka et al. (hereinafter Tanaka).

Claim 1 was rejected in view of Ulichney and Roever. As noted by the examiner Ulichney does not "teach determining when to apply the offset parameter and scale parameter in relation to application of the conversion matrix."

Roever discloses a method of combining a color space matrix transformation and a finite impulse response (FIR) filter (Roever, title). Roever discloses a scaler configured to provide optional scaling of an image (Roever, paragraph 24, lines 1-2). As noted in the equations in paragraphs 11, 13, 14 and 30, offset parameters are used both before (D_0 - D_2) and after (B_0 - B_2) the application of the conversion matrix, while whether or not the scaling is performed before or after the application of the conversion matrix is not discussed at all.

The examiner has asserted that:

It would have been obvious to one of ordinary skill in the art at the present time the invention was made to combine the teachings of *optionally* applying offset parameter and scale parameter (determining when) after application of the conversion matrix as taught by Roever ...

The applicant respectfully disagrees with the examiner's assertion. In particular, Roever does not disclose optionally applying both the offset parameter and the scale parameter. Instead, Roever discloses optionally applying the scaling parameter, while disclosing a system in which offset parameter are used both before and after the application of the conversion matrix. Furthermore, Roever discloses optionally applying image scaling this is not equivalent to nor does it suggest determining when to apply image scaling, which in the context of the applicant's specification

means applying the scaling parameter either before or after the application of the conversion matrix. Thus, Roever does not teach, as asserted by the examiner, determining when to apply image scaling merely whether or not image scaling should be applied at all. For at least this reason claim 1 is allowable over the cited art.

The examiner also asserted that "Roever teaches the scaler provides both scaling (multiply) and offsetting (add) ..."The applicant respectfully disagrees with this assertion. Instead Roever discloses a scaler that uses a multiply-add array of an FIR filter as a color-space converter (Roever, paragraph 24, lines 3-5). The scaler as disclosed in paragraphs 30, 31 and 32 does provide for color space conversion (C_{00} - C_{22}) and offsetting (B_0 - B_2 , D_0 - D_2) of both the input (A_0 - A_2) and the output (A'_0 - A'_2). Although Roever does declare that the scaler may be used to scale the image, Roever does not in fact provide for any means for scaling the image at either the input or the output of the color conversion. Thus, optionally scaling as used by Roever appears only to mean color conversion and offsetting, which is quite different than how the term scaling is used in the context of the present invention as recited in claim 1. This is an additional reason as to why claim 1 is allowable over the cited art.

Furthermore, without the guidance of the applicant's specification, it would not be obvious to someone skilled in the art to modify Roever and Ulichney to include all the features recited in claim 1. For at least these reasons claim 1 is allowable over the cited art.

Claim 9 is allowable for substantially the same reasons as claim 1. Claims 2-10, 11-14 and 28-30 are allowable for substantially the same reason as claim 1.

In view of the foregoing remarks, Applicants respectfully request favorable reconsideration of the present application. Should the examiner believe that any issue(s) remain outstanding, he is encouraged to contact the applicant's undersigned agent in an effort to resolve such issue(s).

Respectfully submitted,

/Daniel A. Ratoff/

Daniel A. Ratoff

Registration No. 54,389

Please address all correspondence to:

Epson Research and Development, Inc.
Intellectual Property Department
2580 Orchard Parkway, Suite 225
San Jose, CA 95134
Phone: (408) 952-6030
Facsimile: (408) 954-9058
Customer No. 20178

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